



Economic Impact Analysis Virginia Department of Planning and Budget

18 VAC 30-20 – Regulations Governing the Practice of Audiology and Speech-Language Pathology

Department of Health Professions

October 4, 2002

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.G of the Administrative Process Act and Executive Order Number 21 (02). Section 2.2-4007.G requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. The analysis presented below represents DPB's best estimate of these economic impacts.

Summary of the Proposed Regulation

The Board of Audiology and Speech-Language (board) proposes to: 1) reduce the active engagement in the profession requirement for individuals licensed in other states who wish to become licensed in Virginia, 2) accept certificates of clinical competence issued by the American Board of Audiology and 3) require that licensed audiologists and speech-language pathologists document their supervision of unlicensed assistants.

Estimated Economic Impact

The board proposes two amendments that will moderately reduce the barriers to entry into the audiology and speech-language pathologist professions in Virginia. First, under the current regulations, individuals licensed in audiology or speech-language pathology in other

states who hold a field-specific¹ masters or doctoral degree may become licensed in Virginia if they have been actively engaged in their profession during the 24 months immediately preceding the date of application. The board proposes to reduce the active engagement in the profession requirement to one of the three past consecutive years. This would allow such individuals who have taken some time off, say for example to have a baby, to still become licensed in Virginia. The difference in the amount of required recent experience as a licensed audiologist or speech-language pathologist seems unlikely to make a significant difference in the competency level of applicants. The reduced recent experience requirement may moderately increase the likelihood that experienced audiologists and speech-language pathologists move to Virginia to practice or open new practice locations in Virginia from across bordering states. This would increase the availability of services for Virginians. The increase in supply of those services could potentially moderately reduce the market prices for those services.

One of the methods by which an individual can obtain a license in audiology or speech-language pathology includes holding a current and unrestricted Certificate of Clinical Competence (certificate) in the area in which he seeks licensure issued by the American Speech-Language-Hearing Association. The board proposes to also accept certificates from the American Board of Audiology or any other accrediting body recognized by the board. According to the Department of Health Professions, the American Board of Audiology does not currently issue certificates, but intends to issue certificates in audiology in the near future.² By accepting certification in audiology from a second accrediting body (American Board of Audiology in addition to American Speech-Language-Hearing Association), the board potentially makes it easier for audiologists to get licensed in Virginia. Hence, there may be more licensed audiologists than there would have been without the second certification option. This would increase the availability of services for Virginians. The increase in supply of those services could potentially moderately reduce the market prices for those services. Given the board's knowledge of and past experience with the American Board of Audiology, the board believes that individuals who earn certification from the American Board of Audiology will be as well trained as those that are certified from the American Speech-Language-Hearing Association. Both of the proposed amendments intended to reduce barriers to entry have the

¹ Audiology and speech-pathology program

² Source: Department of Health Professions

potential to moderately increase the supply of audiologists and speech-language pathologists without reducing skill-related criteria for licensure. Thus, the proposed amendments will likely provide a net benefit.

Licensed audiologists and speech-language pathologists are required to supervise their unlicensed assistants and are fully responsible for their performance and activities. The board proposes to require that the supervision be “documented.” No description of required documentation is provided. A piece of paper signed by the licensee that states that he has supervised his assistants would suffice.³ Since the current regulations already require that licensees supervise their assistants, and the proposed documentation requirement requires minimal effort and does not require the licensee say anything more specific than he is supervising his assistants, this proposed amendment will have minimal impact.

Businesses and Entities Affected

The proposed regulations affect the 423 licensed audiologists, 2,312 licensed speech-language pathologists, their assistants, their patients, and individuals considering becoming either audiologists or speech-language pathologists.

Localities Particularly Affected

The proposed amendments affect all Virginia localities.

Projected Impact on Employment

Together, accepting certificates of clinical competence issued by the American Board of Audiology and reducing the recent-years active engagement in the profession requirement moderately reduce the barriers to entering the audiology or speech-language pathology professions in Virginia. Thus, there may be a moderate increase in the number of audiologists and speech-language pathologists in the Commonwealth.

Effects on the Use and Value of Private Property

Some new audiologist and speech-language pathologist practices may open in Virginia.

³ Confirmed by the Department of Health Professions